

1 know that the issue is there should be a completion.

2 You want to know what's been completed and the
3 time and having something sent back to you like a
4 confirmation completion is what's being asked for, and
5 that's not in place yet.

6 MS. DAVIS: Will you be putting that in place in
7 some form or another?

8 MS. SANDERS: Probably at one time or other. But
9 right now, it's still an open issue. So we don't have any
10 plans at the moment.

11 MS. DAVIS: With respect to orders that you
12 receive electronically, is there an automatic flow-thru on
13 the part of Bell receiving a processing those orders? Or
14 is there some sort of manual support given to those
15 electronic orders?

16 MS. SANDERS: In the beginning, there will be
17 manual support. We'll hope to have automatic flow-thru
18 for resale, mainly the middle or end of the year. With
19 the loop we're working on that also, at this time.

20 MR. BARBER: 1997?

21 MS. SANDERS: 1997.

22 MS. CONOVER: Mr. Albert will address that also
23 in more detail.

24 MS. DAVIS: For the loops, you expect that to
25 be -- that process to be in place mid-year also?

1 MS. DAVIS: Hopefully, yes.

2 MR. BARBER: What sort of standards, if, in fact,
3 when you're going through current written orders and you
4 find a problem or you find something that doesn't match
5 with specs or there is some issue that's come up vis-a-vis
6 that written order, how long -- I mean, do you have a sort
7 of standard of how long it takes to get back to the
8 ordering party and, say, we found this, we got to --

9 MS. SANDERS: Not at this point, at this time,
10 but we're working on it. That was the question that came
11 up yesterday. We don't have anything written as a method
12 in place, but we're working on it.

13 MR. BARBER: See, we do need to talk about this.

14 MS. SOMMI: Yes. There is a big lack of
15 communication when it comes once they've gotten your
16 order, you know, that. But, after that, it's kind of -- I
17 think the question I would have, I realize you're waiting
18 for OBF and what they have planned is excellent. It's
19 every stage. How about if OBF takes another two years, is
20 there any intention of Bell Atlantic to work on a
21 completion?

22 MS. SANDERS: Yes, because it's come up with
23 meetings in AT&T and other carriers. So completion is a
24 big issue and we are aware of it, yes.

25 MR. ALBERT: We will do a manual completion.

1 I've got that on until the OBF gets done. Very analogous.
2 We make a phone call back, saying we're done with it. And
3 really, at this point, all of the unbundled loops we've
4 cut over, every one has been a single cut.

5 MS. DAVIS: What process is in place now to
6 address any problems with orders or any sort of questions
7 or other troubles related to an order?

8 MS. SANDERS: Basically, the reps will just call
9 and initiate an order. Or, also, some reps might send a
10 fax because there is a form for errors on that order. So
11 they might send a fax. It could be either or at this
12 point in time.

13 MS. DAVIS: What is the time period in which Bell
14 notifies a party with regard to any question or trouble
15 Bell has with the party's order?

16 MS. SANDERS: That's kind of open still at this
17 point.

18 MR. WESOLEK: You indicated as of today, you are
19 currently using -- processing both the OBF form and the
20 old form?

21 MS. SANDERS: Um-hum.

22 MR. WESOLEK: What period of time will you
23 continue to process both forms?

24 MS. SANDERS: As we go to each CLEC -- see, the
25 ones we've been using the form, some for over a year, year

1 and a half. We're actually going to go to them and see
2 what's convenient with them.

3 So, the current CLECs that we have, it's going to
4 be just a one-on-one basis, what they want to do. But new
5 CLECs, as they come into the industry or market, begin to
6 be certified. It will just be the new form.

7 MR. ALBERT: Kurt, didn't we offer until you all
8 got trained and were ready to flip over. We'd go ahead
9 and accept the old one.

10 MR. WESOLEK: That was the gist of our
11 conversations, that kind of resolved some of our concerns.
12 I guess the larger question for me that that leaves with
13 me, we've resolved some of the immediate concerns.
14 Potentially putting in some process similar to the
15 processes involved in ONA, Open Network Architecture.
16 There would be appropriate disclosure and notification
17 before any changes in the provision process and forms
18 occur, so that parties have an opportunity to address
19 that.

20 MS. SANDERS: And that's what we're planning on
21 doing as a one-on-one contact with each CLEC, to tell them
22 we're changing and see when that conversion would be for
23 them and when it would be ready. And also if they need
24 training or anything like that on it. It's going to be a
25 one-on-one.

1 MR. WESOLEK: I think that works excellently for
2 right now to address the immediate problem. I guess what
3 I'm looking at is there are a number of OBF issues
4 outstanding that, obviously, are going to be implemented
5 over time. And I don't want to wake up one day and find
6 out that our orders are dropping out because there's a new
7 OBF process.

8 And we didn't know what time you were going to
9 implement it. I guess what I'd like proposed is we have
10 some mutual communication amongst ourselves that there
11 would be advanced warning to those of us using the
12 ordering and billing process when any changes are going to
13 occur.

14 JUDGE SCHNIERLE: It seems to me an obvious
15 answer is go to the OBF meetings and participate. Maybe
16 I'm missing something. It sounds like an industry-wide
17 committee to make these decisions.

18 MS. SANDERS: That's right.

19 MR. WESOLEK: I think the problem is we know when
20 something happens and resolution at the OBF. But there's
21 no consistency across the company that says when Bell
22 Atlantic in Pennsylvania or Maryland is going to implement
23 the OBF form and procedure.

24 MR. ALBERT: I think there's a valid need. What
25 we do today in the access world for access services, we

1 use all users of access ledgers, a mechanism to
2 communicate with all carriers, variety of different types
3 of information.

4 What we're look at now is probably doing
5 something analogous to that for co-carriers and for the
6 local environment. We don't have that nailed down yet,
7 but I think the need you're striking is valid. In order
8 to communicate the same information, the same way to all
9 carriers. And, for instance, when we go from Tuesday to
10 Wednesday, it's, you know, new form, old form.

11 We need to be able to get that out in an advanced
12 fashion for everybody. So, I think we will probably wind
13 up in the more all-users-access-type-of-method.

14 MS. SANDERS: Access, they have sunrise and
15 sunset. That's the way Bell Atlantic has always done
16 their access cuts. We've always been ready to accept it.
17 I don't know if that window is two months or three months.
18 So we're normally able to accept it for a period of time.

19 I would think that since we're going with the OBF
20 rules, that we'll still have something like sunrise and
21 sunset if that's what they're going to do. Of course, the
22 LSR is so close to the ASR, I would think that the rules
23 will probably be the same.

24 If your OBF rep is there, you would know that.
25 They have to stay in constant contact to tell you what the

1 issues are and also so you could have input on the issue
2 because your people out in the field might know more than
3 they know. Really, they need to stay in contact with you
4 on those issues.

5 MS. SOMMI: One comment, I agree with what was
6 stated earlier that it seems very logical to go to a
7 meeting. In all honesty, people can spend their whole
8 life there. OBF, it's not just one meeting once in a
9 while. We get reports, we don't have the resources to
10 commit to someone to go. It does seem logical.

11 But I think a notification, we all know what
12 forms you're using now. All users says it seems like
13 something relatively simple to adopt in the near term for
14 at least the six or seven people that are certified today
15 as to when you're going to start using the new forms.

16 MS. SANDERS: Okay.

17 MS. DAVIS: Mr. Albert, you indicate that Bell's
18 access services are better supported than the unbundled
19 network elements and resale services are being supported
20 now by Bell. Is there any reason that Bell could not
21 simply create the same level of support for unbundled
22 network elements in resale as is provided to access?

23 MR. ALBERT: I wouldn't say better supported.
24 We're inventing all the operational process and procedures
25 as we go, as we work on this stuff with you guys. I mean,

1 up to this point, going from a prior Bell Atlantic
2 developed form so that we could actually do unbundled
3 loans before the national standards were developed to now
4 hitting the national form, this is the first point we've
5 hit where something has changed.

6 So, now we're at the first point where something
7 has changed, we're at the point how do we communicate that
8 to everybody. I mean, we've had 12 years of experience on
9 access, working back and forth and developing process and
10 procedures with each other.

11 You know, we're just at the point now in
12 Pennsylvania where, beginning in October, we were
13 installing the first unbundled loops. And we've been
14 doing it longer in Maryland and building on that
15 experience also.

16 But up to this point, there hadn't been anything
17 that changed that we needed to develop a communication
18 mechanism for.

19 MS. DAVIS: But with regard to the 12 years of
20 experience Bell has providing service to other carriers,
21 like access, for example, are you saying that there is
22 nothing to be gained from that experience that can be
23 translated to the provision of resold services or
24 unbundled network elements?

25 MR. ALBERT: No, no. There are parallels there

1 and that's what we're trying to provide going forward. It
2 would be reasonable to adopt something like that in the
3 access world today. An access type of approach for
4 communication mechanisms for local services.

5 MS. DAVIS: But that hasn't occurred yet?

6 MR. ALBERT: No, we haven't had to do a change
7 yet.

8 MS. DAVIS: Miss Sanders, what are the hours for
9 your order entry centers? What's the coverage on those
10 centers?

11 MS. SANDERS: At this point, they're 8 to
12 4:30.

13 MS. DAVIS: Is that Monday through Friday?

14 MS. SANDERS: Yes.

15 MS. DAVIS: Is that a notification process that
16 we can engage in for hours outside those coverage hours,
17 in what we contact you should there be an emergency?

18 MS. SANDERS: Actually, and I don't have it with
19 me. I'd be glad to send it to you. There's an
20 authorization letter which gives you the same, time,
21 something out, office hours, and numbers you can call as
22 far as the our CSSC center.

23 MS. DAVIS: Are those the same hours you provide
24 customer service to your end-users, to your customers?

25 MS. SANDERS: I don't know what the office hours

1 MR. BARBER: That would be great.

2 MS. SOMMI: Is the person that we would contact
3 for pre-ordering, is that Carl Larson also?

4 MS. SANDERS: Albert Townsend.

5 MR. ALBERT: Yeah, Carl is the EDI.

6 MS. SOMMI: So, this for the pre-ordering is
7 different?

8 MR. ALBERT: Yes, for the electronic
9 communication gateway.

10 MS. SOMMI: So could we get a number?

11 MS. SANDERS: Sure, I'll be glad to get it to
12 you.

13 MR. ALBERT: I'm not sure. If they want somebody
14 to come out and talk about this, is Al the person?

15 MS. SANDERS: Al is the manager. They have about
16 three different people working on the gateway. You could
17 start with him and he could make an appointment with
18 them.

19 MR. ALBERT: Okay. All right. Let's see if we
20 can flip the pages here. On Roman 2, on the ordering and
21 provisioning, now, we've got to change hats. This goes to
22 the EDI, electronic data interexchange side of things.

23 Running through these, we've got the basic
24 ability to, us, Bell Atlantic, receive EDI. That's the
25 item A. That being in the operational category.

1 The return of an acknowledgement, which is
2 basically, yes, we have gotten from the carrier EDI order,
3 you know, that return acknowledgement. That's what item B
4 is for the operational status.

5 Now, the ability then to return errors that have
6 been picked up on the local service request, that's what
7 item C is, again, in the operational status.

8 MR. BARBER: Is that something that would happen
9 automatically? Errors that your system itself would
10 detect or errors detected by someone receiving the order?

11 MR. ALBERT: Combination of both, I think,
12 really.

13 MS. SANDERS: The way it's planned is not 1/15.
14 I think the second phase, which is March. It's going to
15 mainly edited for the ISI, Bellcore industry standard.

16 MR. BARBER: I didn't understand that at all.
17 I'm not ashamed to admit it.

18 MS. SANDERS: That big document for the LSR, all
19 the rules, the usage rulings that you get with the
20 document, we're starting off adding it per those rules
21 exactly.

22 There might be a couple of variations. If there
23 are, you'll know that. We'll tell you what those are.

24 MR. BARBER: The question then is what you're
25 talking about is if a new entrant submitting an order to

1 you were to commit some kind of format error --

2 MS. SANDERS: What do you mean format? Wrong
3 information in the fields?

4 MR. BARBER: Right. Right, improper information,
5 put information from the wrong field or put the wrong
6 information in the right field?

7 MS. SANDERS: It will be returned.

8 MR. BARBER: And the question that I had was
9 whether that happens as a result of some kind of
10 mechanical action at your end or whether that's something
11 someone has to look at it and say, wait a minute, they
12 messed that up. I've got to kick that back.

13 MS. SANDERS: It's going to be mechanical, when
14 the manager goes in our system that you'll send it to.

15 MR. BARBER: And that's what you were talking
16 about the second quarter or second phase?

17 MS. SANDERS: Right, the second phase. And in
18 the first phase, we're going to take. A rep would be
19 calling you back if there's an error. The second phase,
20 which I believe is March, it will be edited mechanically
21 and be returned to you what the errors are.

22 MR. BARBER: So, you're expecting to have second
23 phase up and running March of '97?

24 MR. ALBERT: The first part of it.

25 MR. BARBER: First part of the phase 2.

1 MR. ALBERT: Yeah, A lot of it gets back in to
2 the different stages and steps of OBF standardization, for
3 basic resale. We call that resale as-is. And then I
4 think there's another which is resale. That means you
5 take the customer -

6 MR. BARBER: As-is.

7 MR. ALBERT: Yeah, all the features and
8 capability. Everything, bang. Moves from Bell Atlantic.

9 MR. BARBER: Which GTE doesn't want to do that.
10 That's a different story?

11 MR ALBERT: But the next block of stuff is resale
12 as specified and that gets in to the, well, these features
13 or those.

14 MR. BARBER: We want to pick and choose?

15 MR. ALBERT: Right. Those two blocks which are
16 on March 1 will then be through the local service request
17 manager that we're fully electronic, the no pair of hands
18 at that point.

19 MR. BARBER: Just so I'm clear, for those two
20 particular types of ordering, if someone -- if AT&T were
21 to mess up an order in terms of formating or something,
22 what you're saying is, as of March, it would be
23 immediately shot back to them as a result of a mechanical
24 interaction and, say, the computer has read this and said
25 this is wrong?

1 MR. ALBERT: Am I overstepping?

2 MS. SANDERS: I'm not real positive. I believe
3 those two go on without any hands through. As far as the
4 editing for a loop and everything, the editing will be in
5 place. It won't go on down the line. But they'll get the
6 mechanical editing, but the reps will have to interface to
7 do the service or its writing. We're trying to get the
8 editing for everything.

9 MR. ALBERT: For unbundled loops.

10 MS. SANDERS: As well as resale for 3/1. But
11 just editing but not complete mechanized flow-thru as is,
12 and is specified with the flow-thru.

13 MR. BARBER: This was just in terms of errors
14 kicking back?

15 MR. ALBERT: Um-hum.

16 MS. SANDERS: Kickback errors, I believe.

17 MR. ALBERT: Now, let's see the next one, D.
18 That was the one you were asking about. I don't think
19 this is new news because we've been talking about this
20 back and forth relative to resale.

21 What may be new is unbundling basically be in the
22 same boat relative to this aspect. And what D is talking
23 about is it comes the EDI, electronic order, to Bell
24 Atlantic. There's a software system we're building. It's
25 called a local service request manager.

1 going to work.

2 That was one of the issues that we decided there.
3 Bell was talking about charging different installation
4 charge for each.

5 MR. BARBER: Certainly for non-recurrings,
6 that's an issue, Your Honor. And I think, as to
7 recurrings, that was actually an issue that was
8 stipulated.

9 JUDGE SCHNIERLE: Right. But, I mean, I guess
10 what I'm saying is considering the time frame, I'm not
11 surprised you don't have anything together just yet.

12 MR. ALBERT: Yeah.

13 JUDGE SCHNIERLE: Also, considering, I still
14 haven't gotten the Commission's final order yet. So
15 you're not the only one that's late on the mailing list.

16 MR. BARBER: I don't have my copy.

17 MR. ALBERT: Looking real quick, this is the
18 five-page list of OBF issues that I passed out at the last
19 workshop. Issue 1329, which is combined loop and ports
20 and ordering option. Similarly, other types of
21 combinations. If there were other types, we would have to
22 have them thrown in to OBF and have them developed that
23 way.

24 If that doesn't proceed fast enough or when the
25 need exists, we'd have to come up with something in the

1 interim.

2 Okay. I think that kind of gets us through the
3 page. The only thing I would like to add is a little bit
4 about commercial. I think we got into it with a fair
5 number of questions with the unbundled loop side of
6 things.

7 But the reality of all of this, is do the new and
8 do what hasn't been done before. There's a lot that Bell
9 Atlantic has to do with our technicians and employees to
10 get ready to do it.

11 Also, on the carrier side, there's a lot that you
12 all need to do with your technicians and employees. And
13 the further reality is there's a lot together that we both
14 need to be doing to actually be ready to do this.

15 One thing I'd like to suggest, we'd probably had
16 the most work with MFS and worked pretty successfully. We
17 have done kind of operational readiness tests with MFS as
18 we roll into doing unbundled loops and new geographies.
19 And techniques that they use that we could employ, they
20 basically have put in orders and done lines for some of
21 their own services, initially.

22 Because the very first time, you know, one of
23 your employees does something for the first time, the very
24 first one of ours does it, there's going to be a higher
25 probability for errors on both sides than the second time

1 that they do it and the third time and the fourth time.

2 So, I think we've had pretty good luck trying to
3 do things in test order nature and trying to do things of
4 official service. But trying to do some real work back
5 and forth in the specific geography between the
6 operational employees on both sides, try to get that done
7 before we actually hit the real live customer mode.

8 For anybody who is not, at the moment, doing
9 unbundled loop orders, we would might want to drop back.
10 I would encourage you get and talk with me or other
11 contacts. I think there's a lot of benefit in the
12 up-front stage, to do some of the operational readiness
13 test, and try to get the bugs out and get employees on
14 both sides to actually work it through before we have real
15 live customers that are then screaming as both of us learn
16 together. That's my advertisement.

17 JUDGE SCHNIERLE: Any further questions for Mr.
18 Albert? And I was going to say, why don't we take a 20
19 minute or so break.

20 MS. DAVIS: Actually, I have somebody here from
21 MCI that can address a few things. On behalf of MCI, we
22 have Carol Zimmerman.

23 CAROL ZIMMERMAN, took the stand.

24 MS. DAVIS: Would you describe, briefly, what
25 your responsibilities are on behalf of MCI?

1 is going to be moved from one to the other.

2 MR. ALBERT: Right.

3 JUDGE SCHNIERLE: Whenever the other is ready or
4 over a period of time. So it's not a question of when
5 they change the customer status they will be moved from
6 one to the other. It's that they're replacing their old
7 system with a new one.

8 MR. ALBERT: Right.

9 JUDGE SCHNIERLE: If they're in the old one when
10 they go to the new one, they'll be in the new one.

11 MS. ZIMMERMAN: That was not my understanding.

12 MS. DAVIS: Seamless to the customer.

13 JUDGE SCHNIERLE: Basically. And it's supposed
14 to be seamless to the people ordering loops and so forth.
15 Is that it?

16 MS. ZIMMERMAN: I just want to go back to
17 the -- so there was not two orders required there. Are we
18 required to -- would we be required to utilize and learn
19 all of your universal service order codes? If I want to
20 order call waiting --

21 MS. SANDERS: Actually, that's something I'd have
22 to check. I believe there's supposed to be a table that
23 if a USOC comes in English description, I could check on
24 that. You might not have to be responsible for that. I
25 believe there's a table being designed.

1 MR. ALBERT: I'm not familiar with that.

2 MS. SANDERS: That's a USOC code or features and
3 several different places and I don't know. And we
4 probably have, probably, thousands and thousands of USOC
5 codes. I believe that a table is being designed. I'd
6 have to see exactly what stage it is if you sent in call
7 waiting that the table would see call waiting coming
8 from -- in from you. And we could put it into a USOC.

9 MS. ZIMMERMAN: Are you talking about the
10 form --

11 MS. SANDERS: You're talking resale, are you?

12 MS. ZIMMERMAN: I'm not focusing on the loops. I
13 wanted to focus on the resale end of it.

14 MS. SANDERS: Yes, there is a table that AT&T has
15 that same request. So the table is being designed.
16 Because it is hard to know all the USOCs. I could let you
17 know exactly what stage that is. But there is a table
18 being designed.

19 MS. ZIMMERMAN: My only other concern, if I used
20 EDI to place my service order and I have to turn around
21 and fax you a piece of paper for the listing, or I can
22 send you the DSR, directory service request since that
23 hasn't been finalized, I have a concern as to how your
24 service order center would be able to match those two up.

25 And the directory listing, as I'm sure everyone

EXHIBIT _____

Petition of New York Telephone Company for)
Approval of its Statement of Generally)
Available Terms and Conditions Pursuant)
to Section 252 of the Telecommunications Act)
of 1996 and Draft Filing of Petition for InterLATA Entry)
Pursuant to Section 271 of the Telecommunications)
Act of 1996)
_____)

Affidavit of Michael J. Nelson
on Behalf of Sprint Communications Company L.P.

Michael J. Nelson, being duly sworn upon oath, deposes and states as follows:

1. I am the Director - Local Market Development for Sprint Communications Company, L.P. with responsibility for establishing Sprint local telephone service in the throughout New England and the state of New York. I have a Bachelor of Science degree in electrical engineering (B.S.E.E.) from the University of Kansas and a Masters degree in business administration (M.B.A.) from the University of Missouri. I have seven years of experience in Sprint's local telephone operations which included assignments in Network Operations, Network Installations, Revenues, and Access Charges. I also have seven years of experience in Sprint's long distance operations which includes operator services, information services, state governmental affairs, state regulatory affairs, and marketing support. I have also served as Chair of the Carrier Liaison Committee 800 Database Committee, an industry forum established to resolve

issues surrounding 800 portability. In 1996, I was promoted to my current position.

2. The purpose of my affidavit is to provide facts relating to NYNEX's provision of wholesale and unbundled local telephone services. My affidavit is organized in accordance with the issues list (Appendix) attached to the Notice of Procedures issued March 21, 1997 in this proceeding.

3. Sprint is currently planning to enter the local telephone market. However, at the time of this filing Sprint has zero paying local service customers in the state of New York, and Sprint does not own or operate any local exchange service facilities in New York State. Sprint has been actively testing NYNEX's resold systems and support processes. Sprint has delayed offering resold services for a variety of reasons including NYNEX's operational and interface deficiencies. Further, Sprint is unaware of any large carriers offering resold local services in NYNEX serving territory in New York.

4. Sprint's customer service goal is to consistently "exceed" customer expectations. This motto has helped Sprint survive in a competitive market and has provided Sprint with a well recognized symbol of quality in the Sprint Brand. Sprint has recently received the #1 ranking in the J.D. Powers customer service award category. Further, Sprint for three consecutive years has received the highest ratings for quality of service from the Yankee Group. Sprint is very concerned with its ability to continue its high level of customer satisfaction when utilizing New York Telephone as the underlying provider of services from either a resold or unbundled perspective.

A. INTERCONNECTION AND UNBUNDLING

5. Although Sprint has requested interconnection negotiations with NYNEX and has arbitrated several issues, Sprint has not signed an interconnection agreement with NYNEX. Sprint and NYNEX do not have interconnected facilities for the provision of local exchange service. Sprint is not providing local exchange service to business or residence customers in New York State through resale or unbundled elements.

B. OPERATIONAL AND SUPPORT SYSTEMS

6. Sprint is in the very early stages of testing NYNEX's resold local service offerings in New York. This experience has provided Sprint with an opportunity to obtain an increased level of visibility to NYNEX's processes and systems. Sprint has identified several areas of deficiency that prevent Sprint from offering a parity competitive local services to the consumers of New York. Further, as Sprint moves forward with its local service testing, Sprint is certain to find more additional problems.

Lack of Service Order Flow Through

7. All service orders processed via NYNEX currently require the manual intervention of a NYNEX employee. The NYNEX employee manually intervenes and must retype information into NYNEX legacy systems. This required manual intervention is deficient compared to the service order processing NYNEX provides itself. In the case of NYNEX's own orders, NYNEX allows its orders to flow through without manual intervention. Clearly, the service order processing

provided to Sprint and other competitive carriers is not at parity to the level of service NYNEX provides itself.

8. Sprint is aware that NYNEX plans automate seven (7) service order types in the next few weeks. However, NYNEX has identified more than 39 different service order types. Sprint has requested service order automation plans repeatedly and to date has received no feedback from NYNEX. Therefore, Sprint must conclude that NYNEX has no definite plans to automate the remainder of the 39 service order types and therefore has no definite plans to provide parity service.

Lack of Migration "As-Specified" Capability

9. Sprint has formally requested a service order process for existing customers that will allow Sprint to order service by identifying the services the customer has requested (See Attachment 1A). This process is commonly referred to as Migration "As-Specified." NYNEX has formally refused to provide this service (See Attachment 1B) even though nearly all other incumbent LECs in the United States offer this type service order process. Lack of this service order process, requires Sprint and other NYNEX competitors to develop unique ordering processes for NYNEX thereby, creating additional barriers to effective competition in New York. NYNEX has continued to discuss this important issue with Sprint. However, NYNEX has yet to make any commitment toward the development of the process required by Sprint and other competitive carriers.

10. Further, lack of "As-Specified":